

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ZACKARY ELLIS SANDERS,

Defendant.

Case No. 1:20-cr-00143
The Honorable Judge Ellis

Pretrial Conference: May 7, 2021
Trial: July 12, 2021

HEARING REQUESTED

**MOTION TO COMPEL, OR, IN THE ALTERNATIVE, TO SUBMIT MATERIAL FOR
IN CAMERA INSPECTION**

Zackary Ellis Sanders, through undersigned counsel, moves for an order compelling the government to produce the Title III and/or Pen Register/Trap and Trace order(s) used in the investigation of IP addresses that were alleged to have visited the target website, including the Sanders family's IP address. As grounds for this motion, Mr. Sanders relies on the accompanying memorandum, and incorporates by reference the factual and legal grounds stated in his previously filed motions to compel (ECF Nos. 38, 48, 58, 64, 88, 137, 140, 176, and 241).

Respectfully submitted,

/s/

Jonathan Jeffress (#42884)
Jade Chong-Smith (admitted *pro hac vice*)
KaiserDillon PLLC
1099 Fourteenth St., N.W.; 8th Floor—West
Washington, D.C. 20005
Telephone: (202) 683-6150
Facsimile: (202) 280-1034
Email: jjeffress@kaiserdillon.com
Email: jchong-smith@kaiserdillon.com

/s/

Nina J. Ginsberg (#19472)
DiMuroGinsberg, P.C.
1101 King Street, Suite 610
Alexandria, VA 22314
Telephone: (703) 684-4333
Facsimile: (703) 548-3181
Email: nginsberg@dimuro.com

Counsel for Defendant Zackary Ellis Sanders

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of May 2021, the foregoing was served electronically on the counsel of record through the U.S. District Court for the Eastern District of Virginia Electronic Document Filing System (ECF) and the document is available on the ECF system.

/s/ Jonathan Jeffress
Jonathan Jeffress